

JAP:DCP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

13M157

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 31 U.S.C. § 5332)

ISSAKA ABUBAKARI,

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

Jack Lee, being duly sworn, deposes and states that he is a Special Agent with Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about February 21, 2013, within the Eastern District of New York, the defendant ISSAKA ABUBAKARI did knowingly and with the intent to evade the currency reporting requirements under Title 31, United States Code, Sections 5316(a)(1)(B) and 5316(b), conceal more than \$10,000 in currency and other monetary instruments, to wit, approximately \$61,345 in United States currency in articles of luggage, and transport and transfer and attempt to transport and transfer such currency and monetary instruments from a place outside of the United States to a place within the United States.

(Title 31, United States Code, Sections 5332; Title 18, United States Code, Sections 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bulk cash smuggling discussed in this affidavit, which includes, but is not limited to, my review of the file and conversations with other law enforcement personnel assisting with the investigation.

2. On or about February 21, 2013, the defendant ISSAKA ABUBAKARI arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Delta Flight 9857 from Accra, Ghana].

3. ABUBAKARI had declared on his customs declaration card that he was carrying more than \$10,000 in United States Currency. ABUBAKARI was selected for secondary examination, at which point he told CBP officers that he was only carrying \$9,995 in United States currency.

4. CBP officers asked ABUBAKARI to present the money that he was carrying. The defendant removed a bundle from his pocket and presented it to the CBP officers. CBP Officers proceeded to examine ABUBAKARI's luggage. During that


¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendant, I have not included details of every aspect of this investigation.

examination, CBP Officers recovered an additional \$51,350 hidden in the side panels of the luggage.

5. CBP officers examined the money presented by ABUBAKARI as well as the money recovered in ABUBAKARI's luggage and found a total of \$61,345 in United States currency in his possession.

6. HSI agents read ABUBAKARI his Miranda rights, and the defendant stated that he understood them and was willing to speak without an attorney present. Upon questioning, ABUBAKARI stated that he obtained the money found in his possession by selling cars in Ghana, and that he knew that he was supposed to declare the funds but did not.

WHEREFORE, your deponent respectfully requests that the defendant ISSAKA ABUBAKARI be dealt with according to law.



Jack Lee
Special Agent
Homeland Security Investigations

Sworn to before me this
21st day of February 2013

HONORABLE VIKTOR V. PCHORELSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK